

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**WALESWKA PEREZ *et al.*,**

**Plaintiffs,**

**v.**

**Case No.: 1:24-cv-23719 (JEM)**

**NICOLAS MADURO MOROS *et al.*,**

**Defendants.**

**SERVICE STATUS REPORT**

Plaintiffs Waleswka Perez (as the personal representative of the Estate of Rafael Acosta Arevalo), Luis Lugo Calderon, Luis Humberto De La Sota, and Eduardo José Figuero Marchena (collectively, “Plaintiffs”), file this Service Status Report to update the Court regarding their progress towards effectuating service in this case:

1. Plaintiffs filed the Complaint in this matter on September 27, 2024. ECF No. 1.
2. A summons was issued for each of the six defendants on October 2, 2024. *See* ECF Nos. 9–14.
3. For the purposes of attempting service of process, the six defendants fall into three distinct categories. Two defendants are criminal organizations, the representatives of which reside in federal prison. Four defendants are individuals located outside of the United States who are unreachable by traditional means of service. And, one defendant is an individual believed to reside in the State of Florida.
4. Plaintiffs provide the Court with the following updates as to each category of defendants.
5. On October 16, 2024, Plaintiffs moved the Court to order the U.S. Marshal’s Service to serve Cliver Antonio Alcala Cordones (“Alcala”) on behalf of Defendant Cartel de los

Soles, and Juvenal Ovidio Ricardo Palmera Pineda (“Palmera”) on behalf of Defendant Fuerzas Armadas Revolucionarias de Colombia. Both Alcala and Palmera are serving lengthy sentences in federal prison and, therefore, must be served through the U.S. Marshal’s Service. Plaintiffs’ counsel recently spoke with a representative of the U.S. Marshal’s Service, who informed them that service should happen soon, and further that the delays thus far in complying with the Court’s Order are due to the security level of the Bureau of Prisons facilities in which these individuals are incarcerated.

6. On December 4, 2024, Plaintiffs moved for permission to serve the four defendants located outside the United States by alternative means, including through text message, email, and direct messaging platforms. The Court granted that request. Order, ECF No. 29. Although not believed to be required, out of an abundance of caution, Plaintiffs have decided to have the service documents translated into Spanish (the official language of Venezuela and understood to be the native language of these defendants) before attempting service. Plaintiffs have engaged a process server who is prepared to post and deliver the service documents via the means authorized by the Court. As soon as translation of the documents is complete, service will be attempted.

7. Finally, Plaintiffs have attempted service as to individual defendant Cristopher Figuera (“Figuera”), believed to reside in Florida. A private investigation commissioned by Plaintiffs identified the address listed on the summons as Figuera’s home address. As of the filing of this Service Status Report, service has been unsuccessfully attempted at that address three times. The last attempted service was on December 23, 2024, at 8:32 p.m. Due to the sensitive nature of this case, Plaintiffs suggest that it would be appropriate to allow time for additional attempts to obtain personal service on Figuera before considering whether to post service or seek other alternative means.

Respectfully submitted,

/s/ Francis D. Murray

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